

6.0 ALTERNATIVES

6.1. Introduction

The California Environmental Quality Act (CEQA) requires that an EIR include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the proposed Project and evaluates them, as required by CEQA.

Regulatory Requirements for Identifying and Analyzing Project Alternatives

Key provisions of the CEQA Guidelines on alternatives are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR (Sections 15126.6(a) through (f)).

- “The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.” (Section 15126.6(b))
- “The specific alternative of ‘No Project’ shall also be evaluated along with its impact.” (Section 15126.6(e)(1))
- “The No Project analysis shall discuss the existing conditions at the time the NOP is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (Section 15126.6(e)(2))
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (Section 15126.6(f))
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).” (Section 15126.6(f)(1))
- “For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (Section 15126.6(f)(2)(A))

- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (Section 15126.6(f)(3))

Alternatives Analysis Format and Methodology

CEQA Guidelines Section 15126.6(d) provides that the degree of analysis required for each alternative need not be exhaustive, but rather should be at a level of detail that is reasonably feasible and shall include “sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” Under CEQA Guidelines Section 15151, the EIR must contain “a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences.” Hence, the analysis of environmental effects of the Project alternatives need not be as thorough or detailed as the analysis of the Project itself.

The level of analysis in the following sections is sufficient to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the proposed Project. In addition, each alternative is evaluated to determine whether the Project objectives, identified in Section 6.2, would be substantially attained by the alternative.

The evaluation of each alternative also considers the anticipated net environmental impacts after implementation of feasible Mitigation Measures. The net impacts of the alternatives for each environmental issue area are classified as either having no impact, a less-than-significant impact, or a significant and unavoidable impact. These impacts are then compared to the corresponding impact for the Project in each environmental issue area. To facilitate the comparison, the analysis identifies whether the net incremental impact would clearly be less, similar, or greater than that identified for the Project. Finally, the evaluation provides a comparative analysis of the alternative and its ability to attain the basic Project objectives.

6.2. Project Objectives

The objectives of the project are identified below.

- Create an economically viable project that can be realistically implemented within current and projected economic conditions;
- Assure a high-quality development that is consistent with City and community goals and objectives, the Encinitas General Plan and Municipal Code;
- Establish a development that is consistent with the character of existing and planned development in proximity to the site and is aesthetically compatible with adjacent uses;
- Create a mix of assisted living and memory care units that maximizes density on the developable portion of the site and addresses specific needs of the resident population;

- Develop a high quality and safe senior living facility that would respond to the growing demand for senior housing;
- Create a self-sufficient facility that would provide services and amenities to enhance livability for the on-site resident population;
- Develop affordable units that will provide housing for income qualifying residents within the City of Encinitas;
- Preserve open space on the Project site that will support San Dieguito Lagoon restoration efforts and provide recreational trail connections consistent with the City of Encinitas Trails Master Plan; and
- Create appropriate landscaping buffers to protect the privacy of adjoining neighbors, preserve sensitive habitat and enhance the project and community.

6.3. Potentially Significant Impacts of the Project

A primary consideration in defining project alternatives is their potential to reduce or eliminate significant impacts and to meet most of the objectives of the proposed project. Pursuant to CEQA Guidelines Section 15126.6[b], alternatives to the proposed project include those that are capable of avoiding or substantially lessen any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.

Based on the analysis contained in Chapter 3, Environmental Analysis, the proposed Project would result in potentially significant environmental effects to the following environmental resource topics:

- Aesthetics;
- Biological Resources;
- Cultural Resources;
- Paleontological Resources; and
- Tribal Cultural Resources

With the exception of impacts to aesthetics, implementation of required mitigation measures would avoid or reduce these impacts to less than significant levels.

6.4. Potential Project Alternatives Considered but Rejected

The City and applicant considered several alternatives during its planning process. The following is a discussion of the land use alternatives considered and the reasons why they were not selected for detailed analysis in this EIR.

Per CEQA Guidelines Section 15126.6(c), among the factors that a Lead Agency may use to eliminate alternatives from detailed consideration in an EIR are:

- (i) failure to meet most of the basic project objectives,
- (ii) infeasibility, and
- (iii) inability to avoid significant environmental effects.

6.4.1. Alternative 1, Alternative Project Site

Under Alternative 1, the proposed Senior Living Facility and Single-family Housing units would be constructed at another site in Encinitas. Although the configuration of the buildings may differ from the proposed Project to fit within the dimensions and setback requirements at a different site, the operating capacity of the Senior Living Facility and the number/income restrictions on the Single-family Housing units would remain unchanged.

Conclusion

Alternative 1, Alternative Project Site, was determined to be infeasible for the following reasons:

- The City of Encinitas is generally built out, and there are no other vacant sites of 14 or more acres (Net Developable Property Area) that would allow for the construction of a Senior Living Facility and Single-family Housing that could support the proposed building size, bedroom capacity, and program operations.
- Additionally, Alternative 1 fails to meet the Project objective of preserving open space that will support San Dieguito Lagoon's restoration efforts and provide recreational trail connections consistent with the City of Encinitas Trails Master Plan.

6.4.2. Alternative 2, Alternative Land Uses

Under Alternative 2, the Project site would be developed with apartments for students and faculty of Mira Costa College. This alternative use for the Project site was identified during the public scoping period. For purposes of this analysis, it is assumed that infrastructure and other features required for the Project, such as the pedestrian trail, stormwater management system, Manchester Avenue improvements, open space dedications, etc.) would be similar to those identified for the Project. The Project site is zoned Rural Residential 2 (RR-2), which allows single-family residential development at a density of two (2) dwelling units per acre. Under the current zoning, it is estimated that the 19.027 gross acre site could support approximately 40 single-family housing units. A change in zoning would be required to develop apartments on the site.

Conclusion

Alternative 2, Alternative Land Uses, was determined to be infeasible for the following reasons:

- Alternative 2 fails to meet the Project objective of creating a mix of assisted living and memory care units that maximizes density on the developable portion of the site and addresses specific needs of the resident population.
- Alternative 2 would not avoid the significant impacts to aesthetics, biological resources, cultural/tribal cultural resources, and paleontological resources.

6.5. Alternatives Selected For Further Analysis

The following alternatives have been determined to represent the range of reasonable alternatives to the Project that have the potential to feasibly attain most of the basic Project objectives, but which may avoid or substantially lessen any of the significant effects of the Project.

- Alternative A - No Project/No Development Alternative
- Alternative B - Senior Living Facility Only (Reduced Intensity Alternative)

An EIR must identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is required to identify as environmentally superior an alternative from among the others evaluated. Each alternative’s environmental impacts are compared to the significant impacts of the proposed Project and determined to be environmentally superior, similar, or inferior. Section 6.6 identifies the Environmentally Superior Alternative.

6.5.1. Alternative A - No Project/No Development Alternative

The “No Project” Alternative assumes that no changes to the Project site or existing uses would occur. As such, agricultural operations would continue and the few outbuildings, located on the southwestern corner of the Project site would remain. Implementation of the No Project Alternative would not result in new environmental impacts; however, the No Project Alternative would not satisfy any of the Project objectives.

Aesthetics

The Project site is adjacent to Manchester Avenue, a locally designated scenic roadway, north of San Elijo Lagoon Ecological Reserve, and is just west of I5. With the No Project Alternative, conditions would remain unchanged. As such, the aesthetics and views to and from the Project site would remain unchanged from current conditions, resulting in no impacts to the scenic corridor. The No Project Alternative would avoid significant and unmitigable impacts to this scenic corridor.

Agricultural Resources

The Project site does not contain any land mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Farmland Mapping and Monitoring Program.

As shown on Table 3.2-5, the Project site contains 8.38 acres of Farmland of Local Importance and 10.65 acres of “Urban and Built-Up” lands or “Other Lands.” Additionally, the site is not subject to the provisions of a Williamson Act contract.

The No Action/No Development Alternative would avoid the less than significant impact resulting from the conversion of agricultural land to non-agricultural uses. Forests and timberland resources are not being impacted under either the proposed Project or the No Project/No Development Alternative.

Biological Impacts

Six vegetation communities containing hydrophytic vegetation (south coastal salt marsh, coastal brackish marsh, herbaceous wetland, southern willow scrub, mule fat scrub, and coastal scrub) and four (4) communities that lack hydrophytic vegetation (intertidal estuary, Diegan coastal sage scrub, disturbed habitat, and urban/developed land) were mapped in existing culvert locations south of Manchester Avenue (off-site) that are proposed for improvement as part of the proposed Project.

Under Alternative A (No Project/No Development) the existing habitats would remain and no impacts to biological resources would occur. Because no development would occur, biological resources impacts would be avoided by this alternative.

Cultural Resources

The Project site is used for agricultural purposes and has several outbuildings located near the southwest corner of the site. Field surveys indicate that there are no resources on the Project site which are considered “historical resources” within the meaning of CEQA. No evidence of an archaeological site was observed, and the field survey did not identify any significant cultural resources. However, based upon the identification of isolated artifacts within the Project site area, and the high cultural resource sensitivity surrounding San Elijo Lagoon a significant impact to archaeological resources could occur from the various construction disturbances associated with the proposed Project. Mitigation measures are provided to reduce impacts to these resources to below a level of significance. Under the No Project Alternative, the Project site would remain as is, and no ground-disturbing activities would occur. Therefore, unlike the proposed Project, the No Project Alternative/No Development Alternative would not have the ability to accidentally uncover potentially significant archaeological resources which may be located beneath the surface of the Project site. There would be no impact to cultural resources, and no mitigation measures would be necessary.

Geology and Soils

This alternative would not build and operate the proposed Senior Living Facility and Single-family Housing units and therefore would not disturb the existing geology and soils of the Project site,

including the paleontologically sensitive Delmar/Torrey Sandstone Formation. With the implementation of mitigation measures, geology and soils impacts of the proposed Project would be reduced to below a level of significance. Geology and soils impacts would be avoided by this alternative.

Greenhouse Gas Emissions

The No Project/No Development alternative would not generate GHG emissions from construction and operation of the proposed Project. GHG emissions impacts of the proposed Project are identified as less than significant but would nonetheless be avoided by this alternative.

Hydrology and Water Quality

The No Project/No Development Alternative would not result in either construction or operation of the proposed Project. The No Project/No Development Alternative would not result in alteration of the Project site's drainage patterns from current conditions and neither a SWPPP nor post-construction BMPs would be required. Accordingly, the No Project/No Development Alternative would avoid the water quality and hydrology-related impacts of the proposed Project.

Transportation and Traffic

In contrast to the proposed Project, the No Alternative/No Development Alternative would not generate any vehicle trips and would not have the potential to increase traffic volumes on key intersections and roadways in the Project area. Transportation and traffic impacts associated with implementation of the proposed Project would be avoided by the No Project/No Development Alternative.

Tribal Cultural Resources

This alternative would not involve ground disturbance on-site. Although the City as the Lead Agency has not identified TCRs within the area, it is considered sensitive for potential TCRs (buried cultural resources and/or subsurface deposits). The No Action/No Development Alternative would avoid the grading and excavation activities required for the Project and therefore avoid potential inadvertent impacts to TCRs. This alternative would reduce tribal cultural resources impacts compared to those of the proposed Project.

Conclusion

Overall, Alternative A, No Project/No Development Alternative, would not involve any change in the existing conditions and thus would not create any new significant environmental impacts at the Project site. As provided above, this would result in a complete avoidance of impacts compared to the proposed Project. However, this alternative would not provide any of the benefits of the proposed Project and would not meet any of the Project objectives set forth in Section 6.2 above.

6.5.2. Alternative B - Senior Living Facility Only Alternative

Alternative B, the Senior Living Facility Only Alternative, was identified to reduce significant and unmitigable impacts due to aesthetic impacts identified in Chapter 3.1 of this EIR. For the purpose of this analysis, this alternative assumes that the same Senior Living Facility and infrastructure improvements described in Chapter 2.0 of this EIR would be constructed on-site; however, the Single-family Housing units would be eliminated to reduce the aesthetic impacts associated with construction and operation of the originally proposed Project. This alternative would require construction of improvements similar to those identified for the proposed Project, including grading and installation of an on-site drainage system, connections for utilities, and roadway and trail improvements. This alternative assumes that the area proposed for the Single-family Housing Units (Lots 2 through 9) would either remain undisturbed or would be landscaped for use as an open space amenity for residents of the Senior Living Facility. Similar to the proposed Project, this alternative assumes that 0.13 acres of freshwater marsh, and 1.81 acres of coastal sage scrub would be donated to the San Elijo Lagoon Conservancy.

Aesthetics

Under the Senior Living Facility Only Alternative (Alternative B), the proposed Senior Living facilities would be the same height, square footage and configuration as the proposed Project. The character of the Project area would be similar to the proposed Project since the land use would change from agricultural to developed. With the replacement of the Single-family Housing units with a landscaped area impacts to the scenic view corridor along Manchester Avenue would also be reduced compared to the proposed Project. However, impacts would remain significant and unmitigable. Implementation of the Senior Living Facility Only Alternative would be environmentally superior to the proposed Project for aesthetic impacts.

Agricultural Resources

The Project site does not contain any land mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Farmland Mapping and Monitoring Program. According to FMMP mapping, the Project site contains 8.38 acres of Farmland of Local Importance and 10.65 acres of “Urban and Built-Up” lands or “Other Lands.” Additionally, the Project site is not subject to the provisions of a Williamson Act contract.

Under the Senior Living Facility Only Alternative, with installation of landscaping within the area of the Single-family Housing Units, impacts resulting from the conversion of agricultural land to non-agricultural uses would be the same as those that would occur under the proposed Project.

Biological Resources

The Senior Living Facility Only Alternative would result in similar impacts to biological resources as the proposed Project. Because this alternative would install the same on-site drainage system as

the proposed Project, permanent impacts to ephemeral waters of the U.S. from replacing the natural drainage channel and temporary impacts to freshwater marsh from the culvert improvements would not be reduced. This alternative would avoid coastal sage scrub habitat within the coastal bluffs; however wetland credits from the San Luis Rey River Mitigation Bank would and development of wetland revegetation plan would still be required. Similar to the proposed Project, this alternative would donate on-site freshwater marsh (0.13 acres) and coastal sage scrub (1.81 acres) to the San Elijo Lagoon Conservancy. Implementation of the Senior Living Facility Only Alternative would result in biological resource impacts similar to those identified for the proposed Project.

Cultural Resources

This alternative would result in a similar amount and types of ground disturbance as the proposed Project. Impacts of the proposed Project to archaeological resources are identified as less than significant with mitigation incorporated under the proposed Project, and under Alternative B. Development of this alternative would result in similar impacts to cultural resources.

Geology and Soils

This alternative would result in a similar amount of ground disturbance as the proposed Project and would require similar improvements that consider site-specific geology and soil types. Similar to the proposed Project, compliance with the recommendations of the geotechnical report would result in a less than significant impact to geology and soils and implementation of paleontological monitoring would reduce impacts to paleontological resources. Implementation of this alternative would result in impacts to geology and soils similar to those identified for the proposed Project.

Greenhouse Gas Emissions

As identified in Section 3.6, Greenhouse Gas Emissions, long-term GHG emissions emulate from energy use, solid waste, water use, and transportation. The combined annual emissions of the proposed Project were below the City's significance threshold of 900 MT CO₂E per year. Of this total, approximately 425 MT CO₂E were associated with new vehicle trips. Eliminating the Single-family Housing Component would eliminate the 96 average daily trips associated with this use (See Table 3.8-4), which totals to 33,945 daily trips per year. The reduction in vehicle trips and associated vehicle miles traveled that would reduce annual long-term GHG emissions. Although GHG impacts associated with the proposed Project are already considered less than significant, this alternative would result in less of an impact related to GHG emissions and would be environmentally superior to the proposed Project.

Hydrology and Water Quality

This alternative would change the existing drainage conditions on-site to be similar to that of the proposed Project. This alternative would generate similar water pollutants as the proposed Project

and would implement the same SWPPP and post-construction BMPs to reduce water quality impacts to a less than significant level. This alternative would be environmentally similar to the proposed Project for impacts to hydrology and water quality.

Transportation and Traffic

This alternative would generate fewer trips than the proposed Project. With the elimination of the Single-family Housing units, the Senior Living Facility Only Alternative would generate 616 average daily trips (ADT), 96 fewer daily trips than the proposed Project. This alternative would continue to have a less than significant impact on key intersection and street segment operations. Because the Senior Living Facility Only Alternative would reduce trips generation from the Project site, this alternative would be environmentally superior to the proposed Project for transportation and traffic impacts.

Tribal Cultural Resources

This alternative would result in the same on-site ground disturbance as the proposed Project. While the City has not identified TCRs within the Project area, it is considered sensitive for potential TCRs (buried cultural resources and/or subsurface deposits). The Senior Living Facility Only Alternative would result in impacts to tribal cultural resources similar to those identified for the proposed Project.

Conclusion

Overall, Alternative B, Senior Living Facility Only, would reduce impacts associated with aesthetics, greenhouse gas emissions, and would reduce vehicle trip generation compared to the proposed Project. This alternative would have the same impacts to agricultural resources and would have similar impacts to biological resources, cultural resources, geology and soils, hydrology and water quality, and tribal cultural resources. However, this alternative would not meet the project objective of developing affordable units that will provide housing for income qualifying residents within the City of Encinitas,

6.6. Environmentally Superior Alternative

As required by CEQA Guidelines, Section 15126.6, an EIR must identify an “environmentally superior alternative,” which is the alternative that has the least impact on the environment or would be capable of avoiding or substantially lessening any significant impacts of the project. Table 6-1, Summary of Alternatives Compared to the Proposed Project, shows each alternative’s environmental impacts compared to the impacts of the proposed Project.

The alternative that results in the least environmental impact, considering both the frequency and magnitude of the impact, is the environmentally superior alternative. In cases where the No Project Alternative is environmentally superior, the EIR is required to identify the next environmentally

superior alternative among the others evaluated. Alternative A (No Project/No Development) is the alternative that results in the least environmental impact.

As shown in Table 6-1, Alternative A (No Project/No Development Alternative), would be environmentally superior to the proposed Project under the 9 resource areas analyzed in the EIR. As required by CEQA, the next environmentally superior alternative is Alternative B (Senior Living Facility Only) Alternative. Therefore, Alternative B would be environmentally superior to the proposed Project under 3 resource areas and environmentally similar to the Project under 6 resource areas. However, Alternative B would not substantially lessen the significant unavoidable aesthetic effects of the project; therefore, decision-makers are not obliged by CEQA to select this alternative.

TABLE 6-1 SUMMARY OF ALTERNATIVES COMPARED TO THE PROPOSED PROJECT

	Proposed Project	No Project/ No Development (Alternative A)	Senior Living Facility Only (Alternative B)
1. Aesthetics	SU	NI / +	SU / +
2. Agricultural Resources	LTS	NI / +	LTS / =
3. Biological Resources	LTS-MM	NI / +	LTS-MM / =
4. Cultural Resources	LTS-MM	NI / +	LTS-MM / =
5. Geology and Soils	LTS	NI / +	LTS / =
6. Greenhouse Gas Emissions	LTS	NI / +	LTS / +
7. Hydrology and Water Quality	LTS	NI / +	LTS / =
8. Transportation and Traffic	LTS	NI / +	LTS / +
9. Tribal Cultural Resources	LTS-MM	NI / +	LTS / =
		+ 9	+ 3 = 6
Meets Most of the Basic Project Objectives?	Yes	No	Yes

Notes:

NI Finding of no environmental impact

LTS Finding of less than significant environmental impact

LTS-MM Finding of less than significant environmental impact with mitigation measure

SU Finding of significant and unmitigable impact

+ Alternative is superior (reduced impacts compared) to the proposed Project

- Alternative is inferior (greater impacts compared) to the proposed Project

= Alternative is environmentally similar to the proposed Project or there is not enough information to make a superior or inferior determination.